

EXHIBIT B

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January 29, 2023

VIA ELECTRONIC MAIL

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RE: *Defendant's Initial Disclosures Production on Its Insurance Carrier*

Dear All,

Last week after our hearing, Mr. Klass informed us that Capstone has not had insurance from AIG Specialty Insurance Company ("AIG") in this case. However, Capstone held AIG out to be its insurance carrier when it produced a redacted declaration page (Capstone 1210-1211) from AIG on January 8, 2021 as a part of its Rule 26 initial disclosures.

Thus, in light of Alabama Rule of Civil Procedure Rule 37(a)(3)(A), please help us solve the problem as to why Capstone gave us a AIG insurance declaration page when AIG is not Capstone's carrier in this case. We need to know by Monday, January 30, 2023 by 5 p.m. EST and 4 p.m. CST. Thank you.

Sincerely,

/s/ Blake C. Edwards, Esq.

/s/ Nicole D. Edwards, MBA, Esq.